



**RELIEF REQUESTED**

1. By this Opposition, Defendant respectfully requests that the Court enter an order denying Plaintiff's Motion for Summary Judgment.

2. Pursuant to Rule 7056(d) of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas and Rule 56.4(b) of the Local Rules of the Northern District of Texas, a separate memorandum of law is being filed contemporaneously with this Opposition that will state why Defendant opposes the Motion for Summary Judgment and is incorporated by reference.

**PRAYER**

WHEREFORE, Defendant respectfully requests that the Court deny the relief requested in Plaintiff's Motion for Summary Judgment and grant Defendant such further and other relief to which it is entitled.

Dated: July 1, 2022

Respectfully submitted,

**STINSON LLP**

/s/ Deborah Deitsch-Perez

Deborah Deitsch-Perez

Texas State Bar No. 24036072

Michael P. Aigen

Texas State Bar No. 24012196

3102 Oak Lawn Avenue, Suite 777

Dallas, Texas 75219-4259

Telephone: (214) 560-2201

Email: deborah.deitschperez@stinson.com

Email: michael.aigen@stinson.com

**ATTORNEYS FOR DEFENDANT  
HIGHLAND CAPITAL MANAGEMENT  
FUND ADVISORS, L.P.**

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that, on July 1, 2022, a true and correct copy of the foregoing document was served via the Court's CM/ECF system on counsel for Plaintiff Highland Capital Management, L.P. and on all other parties requesting or consenting to such service in this case.

/s/Deborah Deitsch-Perez

Deborah Deitsch-Perez